

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

MARTIN LEE KENNEDY,	§	
TDCJ NO. 1474898,	§	
Petitioner,	§	
	§	
v.	§	CIVIL NO. 5:17-CV-063-C
	§	
LORIE DAVIS, Director,	§	
Texas Department of Criminal Justice,	§	
Correctional Institutions Division,	§	
Respondent.	§	

**RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL  
WITH BRIEF IN SUPPORT**

The Director was last represented in this cause by Assistant Attorney General Melissa Hargis. However, it became administratively necessary to reassign this case to the undersigned Assistant Attorney General. As a result, the undersigned moves this Court to allow Melissa Hargis to withdraw as counsel and allow the undersigned to substitute as the Assistant Attorney General representing the Director in this federal habeas corpus action. This substitution is not requested to harass the Petitioner or to delay this proceeding. All correspondence should be sent to the same address.

For the foregoing reasons, the undersigned prays that this Court grant her motion and allow Assistant Attorney General Melissa Hargis to withdraw as counsel and substitute the undersigned as the Assistant Attorney General representing the Director in this federal habeas corpus action.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

JEFFREY C. MATEER  
First Assistant Attorney General

ADRIENNE McFARLAND  
Deputy Attorney General  
for Criminal Justice

EDWARD L. MARSHALL  
Chief, Criminal Appeals Division

\*Lead Counsel

s/ Jessica Manojlovich  
JESSICA MANOJLOVICH\*  
Assistant Attorney General  
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ATTORNEYS FOR RESPONDENT

### **CERTIFICATE OF CONFERENCE**

I do hereby certify that a conference is not possible because Petitioner is incarcerated at the Texas Department of Criminal Justice, Correctional Institutions Division. Respondent will not speculate on whether the Petitioner will oppose this motion.

s/ Jessica Manojlovich  
JESSICA MANOJLOVICH  
Assistant Attorney General

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above and foregoing pleading has been served by placing the same in the United States Mail, postage prepaid, on this the 25th day of May, 2015, addressed to: Martin Lee Kennedy, TDCJ No. 1474898, Montford Unit, 8602 Peach Street, Lubbock, TX 79404.

s/ Jessica Manojlovich  
JESSICA MANOJLOVICH  
Assistant Attorney General